



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 22 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Christopher Kitts
General Manager
Huron Lime, Inc.
P.O. Box 451
Huron, Ohio 44839

Re: Notice of Violation
Huron Lime, Inc., Huron, Ohio

Dear Mr. Kitts:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Huron Lime, Inc. (Huron Lime or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Ohio State Implementation Plan and your Title V Permit Number P0086935 at your Huron, Ohio facility.

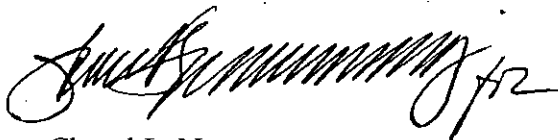
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Molly DeSalle. You may call her at (312) 353-8773 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton", with a stylized flourish at the end.

Cheryl L. Newton
Director
Air and Radiation Division

Enclosure

cc: Mohammad Smidi
Ohio Environmental Protection Agency

Francis X. Lyons
Bryan Cave LLP

IN THE MATTER OF:

Huron, Ohio

§ 7413(a)(1)

EPA-5-12-OH-07

1. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.
2. 40 C.F.R. § 70.1(b) provides that all sources subject to the Part 70 regulations shall have a permit to operate that assures compliance by the source with all applicable requirements.
3. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to initiate an enforcement action whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of Title V of the CAA, or any rule promulgated, issued or approved under Title V of the CAA.
4. EPA fully approved the Ohio Title V program, effective October 1, 1995. 60 Fed. Reg. 42045 (August 15, 1995). Ohio's Title V permit requirements are codified at OAC 3745-77.
5. The Ohio Environmental Protection Agency (OEPA) issued Huron Lime Title V Permit Number P0086935 (Title V permit) on September 30, 2008. The Title V permit expires on October 21, 2013.
6. The Title V permit lists applicable emissions and limitations under Condition number 4(b)(1) for Kiln 2.

7. Condition number 4(b)(1)(a) cites OAC rule 3745-31-05(c), Huron's Permit to Install #03-17221 issued on September 4, 2007, and lists the following two specific limits for Kiln 2:

- 0.051 pounds HCl/ton of lime produced; and
- 2.48 tons HCl per rolling 12-month period.

Factual Background

8. Huron Lime owns and operates a lime manufacturing facility located at 100 Meeker Street, Huron, Ohio (the facility).
9. Huron Lime began operating at the facility in 1966.
10. The facility consists of three rotary kilns that vent to two stacks. Kiln #1 and Kiln #2 vent to Stack #1, and Kiln #3 vents to Stack #2.
11. The kilns are an "emission unit," as that term is defined at Section 40 C.F.R. § 63.7143.
12. "Lime kiln" means the device, including associate preheater, used to produce a lime product from stone feed by calcination. Kiln types include, but are not limited to, rotary kiln, vertical kiln, rotary hearth kiln, double-shaft vertical kiln, and fluidized bed kiln.
13. The kilns release air emissions containing hydrogen chloride (HCl). HCl is released from the combustion of coal in the kilns.
14. Huron performed stack tests on the three kilns in March and May of 2011 to measure HCl and other pollutants.
15. The tests used Extractive Fourier transform infrared (FTIR) spectrometry following EPA Reference Method 321, along with procedures discussed in EPA Reference Method 320 and ASTM Method 6348-10 to quantify HCl at the facility's three kilns.
- a. Kiln 2 was tested on March 29-30, 2011.
16. The results of the HCl testing at Huron Lime were provided to EPA in a response dated June 6, 2011.
17. Test results for Kiln 2 are as follows:

	HCl Average (ppmv)
Run #1	6.82
Run #2	4.99
Run #3	2.58

Run #4	2.10
AVERAGE	4.12

18. The average stack flowrate in wet standard cubic feet per minute (SCFM) for Kiln 2 was reported as 56,268 SCFM.
19. Based on the data collected during the stack testing, presented above, the average HCl emission rate for Kiln 2 was tested at 1.32 pounds HCl per hour.
20. During the testing, the average lime production in tons per hour was averaged to be 14.65 tons of lime per hour.
21. During the testing, Kiln 2 averaged 0.09 pounds of HCl per ton of lime produced.

Violations

22. Kiln 2's average of 0.09 pounds of HCl per ton of lime produced during the Mary 29-30, 2011 HCl testing is in violation of the facility's Title V permit.
23. Huron Lime's violation of its Title V permit constitutes a violation of the Ohio SIP and of the CAA.

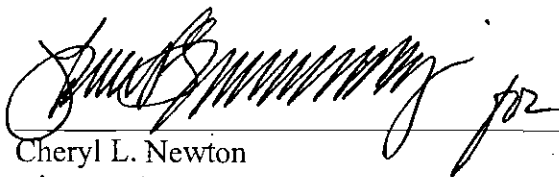
Environmental Impact of Violations

6. These violations have caused or can cause excess emissions of HCl.

Hydrochloric acid is corrosive to the eyes, skin, and mucous membranes. Short-term inhalation exposure may cause eye, nose, and respiratory tract irritation and inflammation and pulmonary edema in humans. Long-term occupational exposure to hydrochloric acid has been reported to cause gastritis, chronic bronchitis, dermatitis, and photosensitization in workers. Prolonged exposure to low concentrations may also cause dental discoloration and erosion.

Date

12/21/11



Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Tracy Jamison, certify that I sent a Finding of Violation, No. EPA-5-12-OH-07, by Certified Mail, Return Receipt Requested, to:

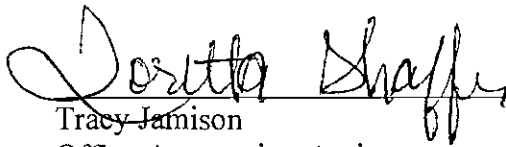
Christopher Kitts
General Manager
Huron Lime, Inc.
P.O. Box 451
Huron, Ohio 44839

I also certify that I sent copies of the Finding of Violation by first class mail to:

Mohammad Smidi
Northwest District Office
Ohio Environmental Protection Agency
347 North Dunbridge Road
Bowling Green, Ohio 43402

Francis X. Lyons
Bryan Cave LLP
161 North Clark Street
Suite 4300
Chicago, Illinois 60601

On the 22 day of December 2011.



Tracy Jamison
Office Automation Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8903